

ITEM: 11

SUBJECT: Amador Water Agency, Pine Grove Community Leachfield System

BOARD ACTION: *Consideration of Revised Waste Discharge Requirements*

BACKGROUND: The Amador Water Agency (the Discharger) operates a community leachfield system (CLS) for the Pine Grove area in Amador County. The Discharger proposed an expansion of the CLS to accommodate growth from its existing 144 EDUs to 219 EDUs. The Discharger completed its RWD in November 2008 and the RWD contained the necessary CEQA filing and an anitdegradation analysis for the expansion.

The proposed Order states the monthly average inflow to the leachfield shall not exceed 28,700 gpd, and upon approval by the Executive Officer of the Phase 2 Completion Report for the leachfield construction, inflow may be increased to maximum of 43,700 gpd. In addition, the proposed Order contains an effluent limitation for total dissolved solids (TDS) not to exceed 350 mg/l over the TDS of the community's source water, which is currently on average is 41 mg/l. The effluent limitation is applied at the dosing tank which is part of the treatment system prior to the wastewater discharge and treatment that occurs via infiltration through the soil column. The proposed Oder contains the same groundwater limitations that were developed for the previous permit: Not greater than background or the following, whichever is greater; TDS at 310 mg/l, Nitrate as N at 10 mg/l and Total Coliform Organisms less than 2.2 MPN /100ml. The Order also includes groundwater limits for pH and to prevent nuisance conditions.

Based on current conditions within the Pine Grove community, The Discharger is required to complete a Feasibility Study for any future expansion. The feasibility study shall identify unsewered areas within the existing wastewater collection system service area and projected sphere of influence and provide a strategy for future connections of unsewered properties to the leachfield system. In addition, the Feasibility Study must evaluate potential improvements to the wastewater treatment and disposal system, including technology improvements and regionalization opportunities.

ISSUES: The California Sportfishing Protection Alliance (CSPA) is contesting the proposed Order and has requested designated party status. Regional Board staff completed a response to comments document, however, the major issues discussed in the public comments are summarized below:

CSPA Comment: *"The California Sportfishing Protection Alliance (CSPA) has reviewed the proposed Waste Discharge Requirements (NPDES No. CA0081787) for Amador Water Agency, Pine Grove Community Leachfield System (Permit) and submits the following comments."*

The Order is for a revised WDR permit. The facility is not an NPDES facility and the number cited is not assigned to the AWA

CSPA Comment: *“Jackson Creek has been shown by sampling to be significantly impacted by high coliform concentrations that have degraded beneficial uses. The City of Jackson has studied these high coliform concentrations and attributed the causes to upstream residential septic systems. In addition to surface flows, there is potential for polluted groundwater to migrate from the leachfield to Jackson Creek.”*

More than 3 years of surface water monitoring demonstrates that the CLS has not impacted surface water with regard to the constituents of TDS, nitrate and chloride. Quarterly monitoring of surface water for total coliform organisms has been added to the proposed Order.

CSPA Comment: *“The proposed WDR fails to prohibit the discharge of unpolluted water such as stormwater to the system and should be revised to require the Discharger to conduct a Water Conservation Program in order to extend the life of the system and ensure compliance with the flow limitation as basic source control measure.”*

Provision 11 of the proposed WDRs addresses the issue of the discharge of pollutant-free water including stormwater into the leachfield system.

CSPA Comments: *“The proposed WDR must be revised to require the Discharger to conduct public education and outreach programs in order to comply with Prohibition No. 2 which states “Discharge of waste classified as “hazardous” under Title 23 CCR Chapter 15, Section 2521, or “designated,” as defined in Section 13173 of CWC is prohibited, and must have some basic source control measures in place.” and “The proposed WDR must be revised to require the Discharger must (sic) develop a sewer ordinance that clearly prohibits the discharge of pollutants that may impact the treatment system.”*

The AWA's Wastewater Regulations, Rate & Rules contains discussions of liquid waste disposal, pretreatment plan requirements, temperature requirements, limitations of the use of the sewer, toxic substances and the installation of interceptors including grease traps and the AWA already conducts regular public outreach to educate its customers with regard to its rules.

CSPA Comment: *“The proposed WDR inappropriately relies on the Tulare Lake Basin Plan's in order to set groundwater limitations. Therefore, proposed WDR Finding No. 51(a) must (sic) be removed and Groundwater Limitations revised.”*

The proposed Order acknowledges that the community of Pine Grove and the CLS are within the bounded area for which the applicable water quality control plan is *Water Quality Control Plan for the Sacramento River and*

*San Joaquin River Basins*, Fourth Edition. The Order does not rely on Tulare Lake Basin Plan to set groundwater limitations. The groundwater limitations for the proposed Order are exactly the same as those contained in the existing Order. The CSPA confuses the distinction between the quality of source water and background groundwater quality. The methodology that is contained in the Tulare Lake Basin Plan was used to develop a numerical effluent limitation for total dissolved solids. The effluent limitation is applied at the dosing tank which is part of the treatment system prior to the wastewater discharge and treatment that occurs via infiltration through the soil column.

CSPA Comment: *"The proposed WDR authorizes the expansion of the WWTP without first conducting an antidegradation analysis. The Discharger must first complete and submit an antidegradation analysis before the Regional Board may consider the proposed WDR for adoption which expands the discharge."*

The Discharger included the antidegradation analysis in its RWD.

CSPA Comment: *"Monitoring Reporting Program must be revised to include field for the (sic) observations receiving water. In addition, monthly monitoring must be conducted."*

The receiving water for this discharge is groundwater and not surface water. The monitoring data demonstrates the discharge has not degraded the surface water. Therefore, the monitoring of surface water as stated in the proposed Order is appropriate and reasonable.

Recommendation: Adopt the proposed Order

Mgmt. Review \_\_\_\_\_

Legal Review PEP

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